

Wisconsin Electric Power Company  
 Wisconsin Gas LLC  
 Rate Case TY2020  
 05-UR-109  
 Sierra Club - 3

Respondent: Scott Maas

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Sierra 3.3: Reference Sierra Club's previous Discovery Request 2.26

- a. Please identify each corporate membership dues paid, each contribution to a not-for-profit entity, and each contribution to an entity that engages in advocacy or public education of any type, that you include in the Company's revenue requirement to be recovered through rates.
  1. This request encompasses, but is not limited to all dues paid to the Electric Power Research Institute, North American Electric Reliability Corporation, Edison Electric Institute, Wisconsin Manufacturers and Commerce, Wisconsin Utility Investors, Wisconsin Utility Association, American Coalition for Clean Coal Electricity, Nuclear Energy Institute, American Gas Association, U.S. Chamber of Commerce, Republican Governors Association, Democratic Governors Association, any state legislative leadership committee, Utility Air Regulatory Group, Utility Water Act Group, Waters Advocacy Coalition, Utilities Solid Waste and Activities Group, American Legislative Exchange Council, National Conference of State Legislators, Third Way, Americans for Tax Reform, State Policy Network, Committee for a Constructive Tomorrow, Americans for Prosperity, Michigan Electric & Gas Association, Metropolitan Milwaukee Association, Greater Milwaukee Committee, The Nature Conservancy, Forrester Research, National Black Chamber of Commerce, National Labor and Management Public Affairs Committee, or Thomas Alva Edison Foundation.
  2. This request includes, but is not limited to, the identity of each organization and/or entity receiving any amount of contribution recorded in account 426.4, "Political and Civil Activities" or account 930.2 "Miscellaneous General Expense".
  3. For purposes of this request, contribution shall mean cash payment, credit payment or extension, in-kind contribution, and/or conveyance of anything of value.
  4. If there are no memberships, contributions, or entities responsive to this request, please confirm this in writing, in particular confirming that no such expenditures are included either in account 426.4, "Political and Civil Activities" or in account 930.2 "Miscellaneous General Expense".
- b. For each membership, contribution and entity that you include in the Company's revenue requirement to be recovered through rates, please separately provide:
  1. The total amount of membership dues and/or contribution.
  2. The portion of membership dues and/or contribution that you seek to recover from ratepayers through rates.
  3. All services and value received by or accruing to ratepayers as a result of any portion of dues and/or contribution you seek to recover from ratepayers.
  4. The portion of the dues and/or contribution used for advocacy, lobbying, litigation, and/or public education, specifying separately the portion for each.

5. Whether any portion of the dues and/or contribution will be used for “advertising” within the meaning of Wis. Stat. § 196.595 and, if so, the amount that will be used for advertising and whether the Company proposes to recover any portion of that amount from ratepayers.
- c. Please identify all amounts spent on government relations, legislative advocacy, regulatory advocacy, marketing, public relations, and/or policy research that you include in the Company’s revenue requirement to be recovered through rates, itemized by subject or topic of such activity.
  1. If there are no expenditures responsive to this request, please confirm this in writing.

RESPONSE:

Attached are two spreadsheets supporting the budgeted spending related to dues and memberships for WEPCO and WG. The amounts are all included in each Company’s as-filed revenue deficiency. These are budgeted amounts and the amount listed for each entity is an estimate and is subject to change.

**Wisconsin Electric Power Company (WEPCO)/Wisconsin Gas LLC**  
**Rate Cast TY2020/05-UR-109**  
**Sierra Club 2.26**

**WE01**

**WEPCO**

**2020 Test Year**

**\$**

| <b>FERC</b> | <b>FERC Description</b> | <b>Membership/Contributions</b>  |        |
|-------------|-------------------------|--|--------|
| 537.00      | Hydraulic Expenses      | Annual membership dues for the National Hydropower Association. The National Hydropower Association is a trade and lobbyist organization that keeps our group up to date on current legislation for hydropower. Our Hydro group has had membership in the NHA for over 20 years and finds great value in the organization. \$5,292 (21%) of dues represent estimated lobbying expenses | 25,200 |

|        |                            |  |         |
|--------|----------------------------|--|---------|
| 921.00 | Office Supplies & Expenses |  | 214,159 |
|        | Office Supplies & Expenses | Wisconsin Energy Workforce Consortium                              | 16,768  |
|        | Office Supplies & Expenses | Wisconsin Manufacturers & Commerce, Emerging Issues Policies Forum | 27,278  |
|        | Office Supplies & Expenses | MIDWEST ENERGY ASSOCIATION   | 1,191   |
|        | Office Supplies & Expenses | Wisconsin Utilities Association                                    | 144,376 |
|        | Office Supplies & Expenses | Utilities Technology Council                                       | 15,287  |
|        | Office Supplies & Expenses | ASUG (Americas' SAP User Group)                                    | 1,492   |

|        |                                |                                     |       |
|--------|--------------------------------|-------------------------------------|-------|
| 928.00 | Regulatory Commission Expenses | Michigan Electric & Gas Association | 7,767 |
|--------|--------------------------------|-------------------------------------|-------|

|        |                                |  |           |
|--------|--------------------------------|--|-----------|
| 930.20 | Miscellaneous General Expenses |  | 1,433,606 |
|        | Miscellaneous General Expenses | National Association of Corporate Directors fees         | 3,789     |
|        | Miscellaneous General Expenses | American Assoc of Blacks                                 | 4,666     |
|        | Miscellaneous General Expenses | Assoc of Edison Illuminating Co                          | 11,964    |
|        | Miscellaneous General Expenses | Better Business Bureau of Wisconsin                      | 2,799     |
|        | Miscellaneous General Expenses | East Towne Association                                   | 7,837     |
|        | Miscellaneous General Expenses | Fuel Milwaukee   | 4,665     |
|        | Miscellaneous General Expenses | Hispanic Professionals                                   | 4,666     |
|        | Miscellaneous General Expenses | MEGA Board Member Fees                                   | 22,077    |
|        | Miscellaneous General Expenses | Metropolitan Milwaukee Assoc of Comm                     | 161,220   |
|        | Miscellaneous General Expenses | National Minority Supplier                               | 11,550    |
|        | Miscellaneous General Expenses | Wisconsin Utility Investors                              | 75,878    |
|        | Miscellaneous General Expenses | American Gas Association (amount unrelated to lobbying)  | 160,233   |
|        | Miscellaneous General Expenses | Edison Electric Institute (amount unrelated to lobbying) | 962,262   |

**TOTAL Membership/Contributions**

**1,680,732**

**Wisconsin Electric Power Company (WEPCO)/Wisconsin Gas LLC**  
**Rate Cast TY2020/05-UR-109**  
**Sierra Club 2.26**

**WE07**

**Wisconsin Gas**

**2020 Test Year**

| <b>FERC</b> | <b>FERC Description</b>    | <b>Membership/Contributions</b>                                    | <b>\$</b> |
|-------------|----------------------------|--|-----------|
| 921.00      | Office Supplies & Expenses |  | 37,354    |
|             | Office Supplies & Expenses | Wisconsin Energy Workforce Consortium                              | 2,755     |
|             | Office Supplies & Expenses | Wisconsin Manufacturers & Commerce, Emerging Issues Policies Forum | 4,480     |
|             | Office Supplies & Expenses | MIDWEST ENERGY ASSOCIATION   | 196       |
|             | Office Supplies & Expenses | Wisconsin Utilities Association                                    | 23,709    |
|             | Office Supplies & Expenses | Utilities Technology Council                                       | 5,975     |
|             | Office Supplies & Expenses | ASUG (Americas' SAP User Group)                                    | 239       |

|        |                                |   |         |
|--------|--------------------------------|---|---------|
| 930.20 | Miscellaneous General Expenses |   | 265,682 |
|        | Miscellaneous General Expenses | National Association of Corporate Directors fees        | 622     |
|        | Miscellaneous General Expenses | American Assoc of Blacks                                | 766     |
|        | Miscellaneous General Expenses | Assoc of Edison Illuminating Co                         | 1,965   |
|        | Miscellaneous General Expenses | Better Business Bureau of Wisconsin                     | 460     |
|        | Miscellaneous General Expenses | East Towne Association                                  | 1,288   |
|        | Miscellaneous General Expenses | Fuel Milwaukee  | 767     |
|        | Miscellaneous General Expenses | Hispanic Professionals                                  | 766     |
|        | Miscellaneous General Expenses | MEGA Board Member Fees                                  | 3,627   |
|        | Miscellaneous General Expenses | Metropolitan Milwaukee Assoc of Comm                    | 26,485  |
|        | Miscellaneous General Expenses | National Minority Supplier                              | 1,898   |
|        | Miscellaneous General Expenses | Wisconsin Utility Investors                             | 12,465  |
|        | Miscellaneous General Expenses | American Gas Association (amount unrelated to lobbying) | 214,573 |

**TOTAL Membership/Contributions**

**303,036**